

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

NO. 16-20195

Plaintiff,

HON. NANCY G. EDMUND

v.

BRIAN MAURICE BROWN,

Defendant.

/

**GOVERNMENT'S MOTION TO REVOKE BOND**

On December 3, 2015, the defendant Bryan Maurcie Brown was charged in a criminal complaint for being a felon in possession of a firearm. (R.1: Complaint). He was indicted on this same charge on March 22, 2016. (R.10: Indictment). After making his initial appearance, Brown was given bond. (R.14: Order).

The Bail Reform Act of 1984 provides that “the attorney for the Government may initiate a proceeding for revocation of an order of release by filing a motion with the district court.” 18 U.S.C. § 3148(b). The Act authorizes the court to order pretrial detention on the basis of dangerousness if there is “no condition or combination of conditions or [pretrial release] will reasonably assure ... the safety of any other person and the community.” 18 U.S.C. § 3142(e), (f).

The government believes that the Court should revoke Brown’s bond and

should hold a hearing where the government can explain the basis for this request. Undersigned counsel has spoken with Brown's attorney, who does not object to a hearing, but does not concur in the relief requested, namely that Court revoke the defendant's bond.

Respectfully submitted,

BARBARA L. MCQUADE  
United States Attorney

s/Steven P. Cares  
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Date: March 21, 2017

**CERTIFICATION OF SERVICE**

I hereby certify that on **March 21, 2017**, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

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